

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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DEBORAH CHIN, Individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN  
AHMED, PH.D. AND STEPHEN NILL,

Defendants.

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Civ. Action No. 04-10294DPW

**STIPULATION AS TO ACCEPTANCE OF SERVICE AND SCHEDULING**

WHEREAS, on February 12, 2004, plaintiff Deborah Chin filed *Deborah Chin, Individually and On Behalf of All Others Similarly Situated v. Sonus Networks, Inc., Hassan Ahmed, PH.D., and Stephen Nill*, Civil Action No. 04-10294, DPW (D. Mass.) (the “*Chin*” Complaint”), a putative class action complaint alleging securities fraud under the Exchange Act; and

WHEREAS, Plaintiff intends to file a motion to consolidate the *Chin* Complaint with all other existing similar actions and later-filed similar actions,<sup>1</sup> and pursuant to the Private Securities Litigation Reform Act of 1995 (the “Reform Act”), intends to move for the appointment of a Lead Plaintiff and approval of the retention of Lead Plaintiff’s counsel;

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<sup>1</sup> A current list of these existing and later-filed similar actions is attached as Exhibit A hereto.

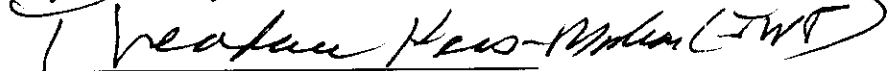
THEREFORE IT IS HEREBY STIPULATED AND AGREED by the parties  
that:

1. Service of the Chin Complaint is accepted by each of the undersigned defendants,  
as of the date hereof or the date of personal service upon the defendants  
whichever is earlier;
2. Defendants need not respond to the Chin Complaint, but shall respond to an  
Amended Consolidated Complaint no later than 45 days after such Amended  
Consolidated Complaint is served upon Defendants by the Lead Plaintiff, to be  
appointed by the Court in order to consolidate the Chin Complaint with all  
other existing similar actions and later-filed similar actions in accordance with  
Section 21D(a)(3) of the Securities Exchange Act of 1934. In the event that the  
Motion to Consolidate is denied, Defendants shall respond to the Chin  
Complaint no later than 45 days after such denial;
3. In the event that any deadline herein falls on a weekend or holiday, that deadline  
shall be extended to following business day; and

4. After appointment of a Lead Plaintiff pursuant to the Reform Act, service on lead counsel for such plaintiff shall satisfy Defendants' service obligations.

**DEBORAH CHIN**, Individually and On Behalf of  
All Others Similarly Situated,

By her attorneys,



Thomas G. Shapiro (BBO# 454680)  
Theodore M. Hess-Mahan (BBO# 557109)  
**Shapiro Haber & Urmy LLP**  
75 State Street  
Boston, MA 02109  
(617) 439-3939

**Cauley Geller Bowman & Rudman, LLP**

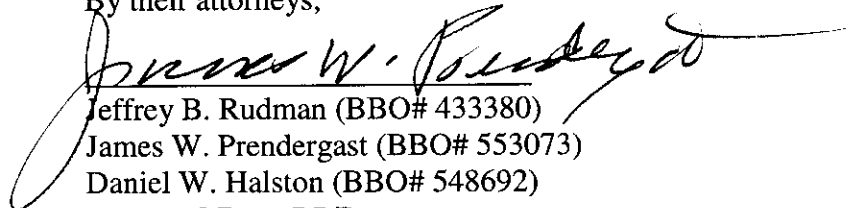
Samuel H. Rudman  
David A. Rosenfeld  
Mario Alba, Jr.  
200 Broadhollow Road, Suite 406  
Melville, NY 11747  
(631) 367-7100

**Schiffrin & Barroway, LLP**

Marc A. Topaz  
Three Bala Plaza East, Suite 400  
Bala Cynwyd, PA 19004  
(610) 667-7706

**SONUS NETWORKS, INC.**

By their attorneys,

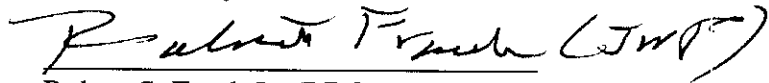


Jeffrey B. Rudman (BBO# 433380)  
James W. Prendergast (BBO# 553073)  
Daniel W. Halston (BBO# 548692)

**Hale and Dorr LLP**  
60 State Street  
Boston, MA 02109  
(617) 526-6000

**HASSAN AHMED, PH.D.**

By his attorneys,



Robert S. Frank Jr. (BBO# 177240)

John R. Baraniak Jr. (BBO# 552259)

**Choate Hall & Stewart**

Exchange Place Building

53 State Street

Boston, MA 02109-2891

(617) 617-248-5000

**STEPHEN J. NILL**

By his attorneys,



Thomas J. Dougherty (BBO# 132300)

Matthew J. Matule (BBO# 632075)

**Skadden, Arps, Slate, Meagher & Flom LLP**

One Beacon Street

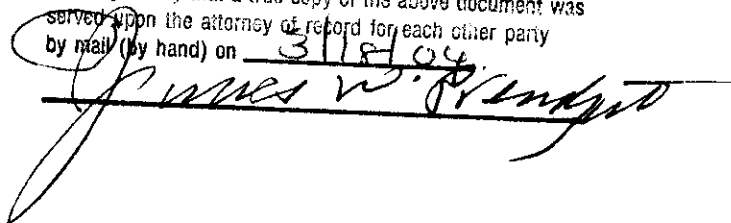
Boston, MA 02108-3194

(617) 573-4800

Dated: March 18, 2004

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the above document was  
served upon the attorney of record for each other party  
by mail (by hand) on 3/18/04



## EXHIBIT A

1. Deborah Chin, Individually and On Behalf of All Others Similarly Situated v. Sonus Networks, Inc., Hassan Ahmed, PH.D., Stephen Nill, C.A. No. 04-10294, DPW (D. Mass.)
2. Richard Curtis, Individually and On Behalf of All Others Similarly Situated v. Sonus Networks, Inc., Hassan Ahmed, PH.D., and Stephen Nill, C.A. No. 04-10314, MLW (D. Mass.)
3. Samantha Den, Individually and On Behalf of All Others Similarly Situated v. Sonus Networks, Inc., Hassan H. Ahmed, Stephen J. Nill, C.A. No. 04-10310, DPW (D. Mass.)
4. Peter Kaltman, On Behalf of Himself and All Others Similarly Situated v. Sonus Networks, Inc., Ruben Gruber, Hassan Ahmed and Stephen Nill, C.A. No. 04-10309, DPW (D. Mass.)
5. Information Dynamics, LLC, On Behalf of Itself and All Others Similarly Situated v. Sonus Networks, Inc., Paul R. Jones, Edward N. Harris, J. Michael O'Hara, Hassan M. Ahmed and Stephen J. Nill, CA. No. 04-10308, DPW (D. Mass.)
6. Michelle Trebitsch, On Behalf Of Herself and All Others Similarly Situated v. Sonus Networks, Inc., Hassan M. Ahmed, Stephen J. Nill, C.A. 04-10307, DPW (D. Mass.)
7. Steve L. Baker, Individually and On Behalf of All Others Similarly Situated v. Sonus Networks, Inc., Hassan M. Ahmed, Stephen J. Nill, C.A. 04-10332, DPW (D. Mass.)
8. Haiming Hu, Individually and On Behalf Of All Others Similarly Situated v. Sonus Networks, Inc., Hassan M. Ahmed, Stephen J. Nill, C.A. No. 04-10346, DPW (D. Mass.)
9. Samuel Ho, Individually and On Behalf Of All Others Similarly Situated v. Sonus Networks, Inc., Hassan M. Ahmed, Stephen J. Nill, C.A. No. 04-10363, DPW (D. Mass.)
10. Ronald Kassover, On Behalf of The Ronald Kassover IRA and All Others Similarly Situated v. Sonus Networks, Inc., Hassan M. Ahmed, Stephen J. Nill, C.A. No. 04-10329, DPW (D. Mass.)
11. Michael Kaffee, Individually and On Behalf of All Others Similarly Situated v. Sonus Networks, Inc., Hassan M. Ahmed, Stephen J. Nill, C.A. 04-10345, DPW (D. Mass.)

12. Wheaton Electrical Services Retirement 401K Profit Sharing Plan, On Behalf of Itself and All Others Similarly Situated v. Sonus Networks, Inc., Hassan M. Ahmed, Stephen J. Nill, C.A. No. 04-10383, DPW (D. Mass.)
13. Charles Starbuck, Individually and On Behalf of All Others Similarly Situated v. Sonus Networks, Inc., Hassan Ahmed, PH.D., Stephen Nill, C.A. No. 04-10362, DPW (D. Mass.)
14. Robert Conte and Mark Respler, Themselves and On Behalf of All Others Similarly Situated v. Sonus, Hassan Ahmed, PH.D., Stephen Nill, C.A. No. 04-10382, DPW (D. Mass.)
15. Jeffrey C. Rodrigues, Individually and on Behalf of All Others Similarly Situated v. Sonus Networks, Inc., Hassan M. Ahmed, Stephen J. Nill, C.A. No. 04-10364, DPW (D. Mass.)
16. Brian Clark, Individually and on Behalf of All Others Similarly Situated v. Sonus Networks, Inc., Paul R. Jones, J. Michael O'Hara, Hassan M. Ahmed and Stephen J. Nill, C.A. No. 04-10454, DPW (D. Mass.)